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Roebbelin Contracting, Inc.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re
PG&E Corporation,
Debtor-in-Possession.

Case No. 19-30088-DM
Chapter 11
Hon. Dennis Montali

In re
Pacific Gas and Electric Company
Debtor-in-Possession.

Case No. 19-30089-DM
Chapter 11
Hon. Dennis Montali

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

**ROEBBELEN CONTRACTING, INC.'S
SIXTEENTH NOTICE OF
CONTINUED PERFECTION OF
MECHANICS LIENS PURSUANT TO
§ 546(b)(2) AND REPORT OF
PAYMENTS RECEIVED**

Roebbelon Contracting, Inc. (“Roebbelon”) hereby files its Sixteenth Notice of Continued Perfection of Mechanics’ Liens Pursuant to § 546(b)(2) and Report of Payments Received (the “Notice”) and in support thereof states as follows:

1. On January 29, 2019 (the “Petition Date”), the above-captioned debtors (the “Debtors”) filed voluntary Chapter 11 bankruptcy petitions.

ROEBBELEN CONTRACTING, INC.'S SIXTEENTH NOTICE OF CONTINUED PERFECTION OF
MECHANICS LIENS PURSUANT TO § 546(b)(2) AND REPORT OF PAYMENTS RECEIVED 1/3

1 2. As of the Petition Date, Roebbelan had approximately 80 projects under
2 construction in support of the Debtors' strategic initiatives of safety, reliability, affordability, and
3 consumer focus. The improvements performed by Roebbelan are designed to result in quicker
4 response times, improved vehicle maintenance, better logistics for replacement materials, hazardous
5 materials storage, and improvements to dispatch conference centers, including solutions for
6 mapping, tracking outages, and safety trainings. Roebbelan's work also relates to a security program
7 for these same facilities, which Roebbelan is informed and believes have been identified by the
8 Department of Homeland Security as known targets, including upgrading their fencing and security
9 systems to meet improved security standards.

10 3. Before and after the Petition Date, Roebbelan has provided labor, services,
11 equipment, and materials for works of improvement owned by Pacific Gas & Electric Company
12 located in the following counties, all of which are located in the State of California: Alameda; Contra
13 Costa; Fresno; Kings; Merced; Sacramento; San Francisco; and San Joaquin (among others).
14 Roebbelan has lien rights (collectively the "Liens") related to these works of improvement. *See* Cal.
15 Civ. Code § 8050(a) (defining works of improvement).

16 4. Through the filing of this Notice, the amounts owing to Roebbelan on account of
17 the Liens is at least \$5,552,678.73, not including interest and other charges, with additional amounts
18 accrued and owed after the filing of this Notice.

19 5. Roebbelan properly perfected its Liens pursuant to California Civil Code §§ 8400 *et*
20 *seq.* by timely recording its Liens in the above-named counties. *See* Cal. Civ. Code § 8412
21 (establishing deadlines for contractor to record lien claims). Roebbelan may have also filed releases
22 reflecting downward adjustments to some of the amounts originally claimed in the Liens. An index
23 of the Liens and releases is attached as **Exhibit A** and authentic copies of the Liens and releases are
24 attached as **Exhibit B** to this Notice.¹

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¹ To the extent that there is a discrepancy between this Notice, the index attached as **Exhibit A**, and the recorded Liens and releases attached as **Exhibits B**, the recorded documents shall control. Roebbelan reserves the right to modify the Liens and releases, such as to increase or decrease the amount.

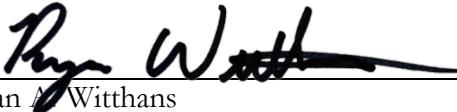
1 6. Pursuant to California Civil Code § 8460, an action to enforce a lien must be filed
2 within 90 days after recordation of the lien. The automatic stay imposed by 11 U.S.C. § 362(a)
3 precludes Roebbelon from filing an action to enforce its Liens. When applicable law requires
4 commencement of an action to perfect, maintain, or continue the perfection of an interest in
5 property, and the action was not filed prior to the bankruptcy petition date, then the claimant must
6 instead give notice within the time fixed by law for filing the action. 11 U.S.C. § 546(b); *Village*
7 *Nurseries v. Gould (In re Baldwin Builders)*, 232 B.R. 406, 410–15 (B.A.P. 9th Cir. 1999); *see Village*
8 *Nurseries v. Greenbaum*, 101 Cal. App. 4th 26 (2002).

9 7. Roebbelon hereby provides notice of its rights as a perfected lienholder pursuant to
10 California's law as to the Liens. To comply with all applicable law, including California state law and
11 bankruptcy law, 11 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), Roebbelon is filing and serving this
12 Notice to preserve, perfect, maintain, and continue the perfection of its Liens and its lien rights in
13 the properties identified therein. This Notice constitutes the legal equivalent of having commenced
14 an action to foreclose the Liens in the proper court. Roebbelon intends to enforce its lien rights to
15 the fullest extent permitted by law. The interests perfected, maintained, and/or continued by the
16 Liens extend to the proceeds, products, rents, and profits of the liened properties.

17 8. Roebbelon reserves all rights, including the right to amend or supplement this
18 Notice.

19 Dated April 29, 2020

FINESTONE HAYES LLP

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22 Ryan A. Witthans
Counsel for Creditor
Roebbelon Contracting, Inc.

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28 ROEBBELEN CONTRACTING, INC.'S SIXTEENTH NOTICE OF CONTINUED PERFECTION OF
MECHANICS LIENS PURSUANT TO § 546(b)(2) AND REPORT OF PAYMENTS RECEIVED 3/3